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|----|--|---|--|
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| 7 | Attorneys for Defendant, Select Portfolio Servicing, Inc. | | |
| 8 | UNITED STATES DISTRICT COURT DISTRICT OF NEVADA | | |
| 9 | DISTRICT OF NEVADA | | |
| 10 | NATALIE C. ROSENBAUM AND RICHARD A. ROSENBAUM, | Case No.: 2:21-cv-00162- KJD-VCF | |
| 11 | , | JOINT MOTION TO EXTEND | |
| 12 | Plaintiff, | DEADLINE TO RESPOND TO PLAINTIFFS' COMPLAINT (FIRST | |
| 13 | VS. | REQUEST) | |
| 14 | SELECT PORTFOLIO SERVICING, INC., | | |
| 15 | Defendant. | | |
| 16 | | | |
| 17 | Plaintiffs, Natalie C. Rosenbaum and | Richard A. Rosenbaum ("Plaintiffs"), and | |
| 18 | Defendant, Select Portfolio Servicing, Inc. ("SPS") (collectively the "Parties"), by and through | | |
| 19 | their counsel of record, hereby stipulate and agree as follows: | | |
| 20 | On January 30, 2021, Plaintiffs filed their Complaint [ECF No. 1]. SPS was served with | | |
| 21 | Plaintiff's Complaint on February 2, 2021. The deadline for SPS to respond to Plaintiffs' | | |
| 22 | Complaint is February 23, 2021. The Parties have discussed extending the deadline for SPS to | | |
| 23 | respond to Plaintiffs' Complaint by an additional thirty days to allow for better investigation o | | |
| 24 | the allegations against SPS and discuss possible resolution of the matter. | | |
| 25 | WHEREAS, the Parties hereby stipulate and agree to extend the deadline for SPS to fil | | |
| 26 | its responsive pleading to Plaintiffs' Complaint to March 25, 2021. | | |
| 27 | This is the first stipulation for extension of time for SPS to file its responsive pleading | | |
| 28 | The extension is requested in good faith and is not for purposes of delay or prejudice to any othe | | |
| 20 | | | |
| | | | |

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| 1 | party. | |
| 2 | As part of this stipulation, SPS agrees to pa | articipate in any Rule 26(f) conference that |
| 3 | occurs during the pendency of this extension. | |
| 4 | DATED this 8th day of February, 2021. | |
| 5 | | |
| 6 | WRIGHT, FINLAY & ZAK, LLP | FREEDOM LAW FIRM |
| 7 | | s/ George Haines |
| 8 | | George Haines, Esq. Nevada Bar No. 9411 |
| 9 | Ramir M. Hernandez, Esq. | 3985 S. Eastern Avenue, #350 |
| 10 | | Las Vegas, NV 89123 Attorneys for Plaintiffs, Natalie C. |
| 11 | Las Vegas, NV 89117 | Rosenbaum and Richard A. Rosenbaum |
| 12 | Attorneys for Defendant, Select Portfolio Servicing, Inc. | |
| 13 | | |
| 14 | | |
| 15 | | T IS SO ORDERED: 🚙 |
| 16 | | - 1 Salah |
| 17 | T T | INITED CTATEG MA CIGTO ATE HIDGE |
| 18 | | UNITED STATES MAGISTRATE JUDGE |
| 19 | I | DATED: 2-8-2021 |
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| | Page 2 of 3 | |

CERTIFICATE OF SERVICE I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFFS' COMPLAINT (FIRST REQUEST) on the 5th day of February, 2021, to all parties on the CM/ECF service list. /s/ Jason Craig An Employee of WRIGHT, FINLAY & ZAK, LLP